

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 22, 2011

Reply to Attn of: Safety and Assurance Requirements Division

TO: Director, Audits and Assessments Division

FROM: Deputy Chief, Safety and Mission Assurance

SUBJECT: 2010 Quality Audit, Assessment and Review (QAAR) - Quality Requirements Set for Facility Procurements

In response to your e-mail of November 19, 2010, regarding the 2010 QAAR -- Quality Requirements Set for Facility Procurements dated September 22-24, 2010, the Safety and Assurance Requirements Division (SARD) reviewed related directives and determined that, while there are no gaps in the current Agency requirements, the auditor's concern regarding possible misinterpretations of the applicability of the directives is valid.

NPD 8730.5, NASA Quality Assurance Program Policy, contains policy to ensure that NASA quality assurance programs meet certain minimum requirements. NPR 8735.2, Management of Government Quality Assurance Functions for NASA Contracts, provides implementing requirements for Government contract quality assurance policies of NPD 8730.5 and the Federal Acquisition Regulations (FAR), Part 46.

The QAAR auditor's concern was that higher level quality requirements do not appear to apply for facilities that are critical to the success of NASA missions. The concern is rooted in the exemptions provided to facilities acquisition and facilities maintenance documented in NPR 8735.2, paragraph P.2.d, that states:

This NPR does not apply to quality assurance functions related to the acquisition of NASA facilities or to facilities maintenance operations. Quality assurance requirements for such acquisitions/services are performed in accordance with NPR 8820.2, Facility Project Implementation Guide, NPR 8831.2, Facilities Maintenance Management, and FAR/NFS regulations.

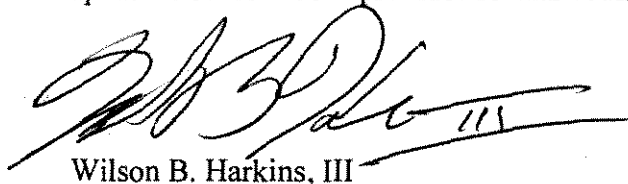
The key in determining the applicability of quality assurance requirements for facilities and items contained in facilities is the definition of "facility." The appropriate definition from NPR 8820.2F is:

Facility -- land, buildings, structures, and other real property improvements including utility systems and collateral equipment. The term does not include operating

materials, supplies, special tooling, special test equipment, or noncapitalized equipment (See Financial Management Manual for criteria for capitalized equipment).

Items that are contained on or within the land, buildings, or structure (e.g., critical test equipment) are not included in this definition and, thus, do not fall under the NPR 8735.2 exemption. Similarly, NPR 8820.2F does not contain quality assurance requirements for critical equipment (since it applies to facilities and not to equipment); the requirements of NPD 8730.5 and NPR 8735.2 apply. Note that this is consistent with the requirements of NPR 7120.7, NASA Information Technology and Institutional Infrastructure Program and Project Management, paragraph 1.1.2.b.(1), that also excludes critical technical facilities from coverage under infrastructure ("facilities") requirements and cites NPR 7120.5, NASA Space Flight Program and Project Management Requirements as the governing requirements document. NPR 7120.5 references NPD 8730.5 and NPR 8735.2 as the governing quality assurance documents.

I agree with the conclusion that the requirements of NPD 8730.5 and NPR 8735.2 apply to critical equipment contained within facilities or obtained in conjunction with facility acquisitions. I also agree with the auditor and SARD that the requirements as written should be clarified concerning application of the facility exclusion. SARD will post this clarification on the Safety and Mission Assurance documentation website/document tree until a subsequent update to NPR 8735.2 provides formal codification of this interpretation.

A handwritten signature in black ink, appearing to read 'WBHarkins III', with a horizontal line extending to the right.

Wilson B. Harkins, III

cc:

Office of Safety and Mission Assurance/Dr. Stamatelatos
Mr. Hughitt

SMA Website/Document Tree